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UBER TECHNOLOGIES, INC.  
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

WAYMO LLC,  
  
Plaintiff,  
  
v.  
  
UBER TECHNOLOGIES, INC.,  
OTTOMOTTO LLC; OTTO TRUCKING LLC,  
  
Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF THOMAS J.  
PARDINI IN SUPPORT OF  
DEFENDANT OTTO TRUCKING'S  
ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL ITS OPPOSITION  
TO WAYMO'S SECOND  
SUPPLEMENTAL BRIEF IN  
SUPPORT OF ITS MOTION FOR  
ORDER TO SHOW CAUSE  
(DKT. 2086)**

1 I, Thomas J. Pardini, declare as follows:

2 1. I am a member of the Bar of the State of California and an attorney at the law firm  
3 of Morrison & Foerster LLP. I make this declaration based upon matters within my own personal  
4 knowledge and if called as a witness, I could and would competently testify to the matters set  
5 forth herein. I make this declaration in support of Defendant Otto Trucking's Administrative  
6 Motion to File Under Seal Its Opposition to Waymo's Second Supplemental Brief in Support of  
7 its Motion for Order to Show Cause (Dkt. 2086).

8 2. I have reviewed the following documents and confirmed that only the portions  
9 identified below merit sealing:

Document	Portions to Be Filed Under Seal
Exhibit A to the Walsh Declaration	Entire Document

13 3. The entirety of Exhibit A to the Walsh Declaration is an expert report from  
14 Mr. Kevin Faulkner relating to Uber's computer and server systems. It contains highly  
15 confidential information regarding the names and details of servers at Uber, and hostnames and  
16 serial numbers of company and personal devices. This information is not publicly known, and its  
17 confidentiality is strictly maintained. I understand that disclosure of this information would  
18 threaten the security of the internal systems of Uber's network.

19 4. Exhibit A also contains lists of employees who were custodians of documents, as  
20 well as personal contact information for some of the employees. Defendants request this  
21 information be kept confidential in order to protect the privacy of individuals at a company that is  
22 currently the subject of extensive media coverage.

23 5. Defendants' request to seal is narrowly tailored to the portions of Otto Trucking's  
24 Motion that merit sealing.

25 I declare under penalty of perjury that the foregoing is true and correct. Executed this  
26 30th day of October, 2017 at San Francisco, California.

27 /s/ Thomas J. Pardini  
28 Thomas J. Pardini

**ATTESTATION OF E-FILED SIGNATURE**

I, Arturo J. González, am the ECF User whose ID and password are being used to file this Declaration. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that Thomas J. Pardini has concurred in this filing.

Dated: October 30, 2017

/s/ Arturo J. González

ARTURO J. GONZÁLEZ